

# **EXHIBIT 14**

## Samantha Wolff

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**From:** Samantha Wolff  
**Sent:** Monday, May 1, 2017 4:36 PM  
**To:** Tiffany L. Bacon  
**Cc:** Alison Hurley; Kurt A. Franklin; Victor Otten  
**Subject:** RE: Spencer, et al. v. Lunada Bay Boys, et al. - Follow-up

Hi Tiffany,

Thanks for your email. The below comports with my recollection of the call. The only other discussion points I'd add are as follows:

- Regarding Interrogatory No. 3 to Frank Ferrara, you had asked if there is a date cut-off that we would agree to and I said I'd let you know. After further reflection, we do not need to know every address where Frank has ever lived, however we do want to know when and where he has lived in Palos Verdes Estates. Does that help?
- Regarding the written discovery, I indicated that we need your clients' responsive documents within the next couple of weeks. You stated today that it is likely to take longer as you may need a subpoena to obtain the phone records, but that you are working on it.
- I am working on Ken Claypool's availability and also confirming whether we have Jim Russi's contact information.

Sincerely,  
Samantha

**From:** Tiffany L. Bacon [mailto:tbacon@bremerwhyte.com]  
**Sent:** Wednesday, April 26, 2017 2:46 PM  
**To:** Samantha Wolff <SWolff@hansonbridgett.com>  
**Cc:** Tiffany L. Bacon <tbacon@bremerwhyte.com>; Alison Hurley <ahurley@bremerwhyte.com>  
**Subject:** Spencer, et al. v. Lunada Bay Boys, et al. - Follow-up

Hi Samantha,

I am following up on our Friday, April 21st, telephone meeting. The following shall provide a summary of our discussion:

- Responses to Plaintiff Spencer's interrogatories set one, to Charlie Ferrara and Frank Ferrara will be served.
- Regarding Frank Ferrara's responses to Plaintiff Reed's interrogatories, set one, I tried to meet and confer with you regarding the continued ability to serve objections, as necessary, to these interrogatories. However, you indicated you cannot agree to stipulate to the assertion of objections to these interrogatories as it would impact your clients.
- I appreciate you sending us the link to Plaintiffs' complete production of documents in this matter.
- You confirmed that, for purposes of the information being sought in the written discovery, information or documents, to the extent such exists, need only go back to 2012.
- You will determine if you have the contact information for Jim Russi, an alleged witness provided in Plaintiffs' supplemental disclosures.
- You will also be sending me available dates for the deposition of Ken Claypool, another alleged witness provided in Plaintiffs' supplemental disclosures.

Please let me know if the foregoing does not comport with your understanding of our discussion. Thank you.

Kind regards,

**Tiffany L. Bacon**

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